

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF THE  
KINGDOM OF DENMARK (SKAT) TAX REFUND  
LITIGATION,

MASTER DOCKET  
1:18-md-02865 (LAK)

This paper applies to:

1:18-cv-10028, 1:18-cv-10030, 1:18-cv-10031, 1:18-cv-10032,  
1:18-cv-10035, 1:18-cv-10036, 1:18-cv-10039, 1:18-cv-10049,  
1:18-cv-10060, 1:18-cv-10061, 1:18-cv-10062, 1:18-cv-10063,  
1:18-cv-10064, 1:18-cv-10065, 1:18-cv-10066, 1:18-cv-10069,  
1:18-cv-10070, 1:18-cv-10071, 1:18-cv-10073, 1:18-cv-10074,  
1:18-cv-10076, 1:18-cv-10077, 1:18-cv-10080, 1:18-cv-10082,  
1:18-cv-10083, 1:18-cv-10086, 1:18-cv-10096.

**NOTICE OF MOTION OF  
THE LAW FIRM OF POULOS LOPICCOLO PC  
SEEKING LEAVE TO WITHDRAW AS COUNSEL TO  
DEFENDANTS MATTHEW TUCCI AND HIS ASSOCIATED PENSIONS PLANS**

**PLEASE TAKE NOTICE** that the undersigned attorney of record shall move the Court before the Honorable Lewis A. Kaplan, U.S.D.J., at Courtroom 21B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, on a day and at a time to be determined by the Court, pursuant to Local Civil Rule 1.4, for an Order granting leave for the law firm of Poulos LoPiccolo PC to withdraw as counsel for Defendants Matthew Tucci, The Cardinal Consulting Pension Plan, The Egret Associates LLC 401K Plan, The Crow Associates Pension Plan, The Heron Advisors Pension Plan, The Hoboken Advisors LLC 401K Plan, The Jayfran Blue Pension Plan, The JT Health Consulting LLC 401K Plan, The Lakeview Advisors 401K Plan, The Osprey Associates LLC 401K Plan, The Sandpiper Pension Plan, The Zen Training LLC 401(K) Plan, The Everything Clean LLC 401K Plan, The Jump Group LLC 401K Plan, The Oaks Group Pension Plan, The Wave Maven LLC 401K Plan, The Beech

Tree Partners 401K Plan, The Blackbird 401K Plan, The Chambers Property Management LLC 401K Plan, FiftyEightSixty LLC Solo 401K Plan, The Hawk Group Pension Plan, The Hibiscus Partners LLC 401K Plan, The Maple Advisors LLC 401K Plan, OneZeroFive LLC Solo 401K Plan, The Sea Bright Advisors LLC 401K Plan, The TAG Realty Advisors 401K Plan, The Throckmorton Advisors 401K Plan and The Robin Daniel Pension Plan, all in the above-captioned action(s); and

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, the Movant shall rely upon (a) the Declaration of Joseph LoPiccolo, Esq. and (b) the Memorandum of Law in Support of Counsel's Withdrawal; and

**PLEASE TAKE FINAL NOTICE** that pursuant to Local Civil Rule 1.4, the law firm of Poulos LoPiccolo PC is not asserting a retaining or charging lien in this matter.

Respectfully submitted,

**POULOS LOPICCOLO PC**

s/ Joseph LoPiccolo  
Joseph LoPiccolo, Esq.  
1460 Broadway  
15th Floor, Suite No. 15003  
New York, New York 10036  
Tel: (732) 757-0165  
Fax: (732) 358-0180  
Email: [lopiccolo@pllafirm.com](mailto:lopiccolo@pllafirm.com)

Dated: November 21, 2023  
New York, New York